

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	19-cr-10063-DJC
	)	
RANDALL CRATER,	)	
	)	
Defendant	)	

DEFENDANT RANDALL CRATER'S MOTION *IN LIMINE* FOR PRODUCTION  
OF LAW ENFORCEMENT NOTES AND TAPE RECORDINGS, IF ANY

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Defendant Randall Crater, by and through undersigned counsel, moves this Honorable Court, pursuant to Local Rules 116.9 and 117.1 to order the government to produce all statements as defined by 18 U.S.C. § 3500(e) and Fed. R. Crim. P. 26.2(f) and all contemporaneous notes, memoranda, statements, reports, surveillance logs, tape recordings (if any), and other documents memorializing matters relevant to the charges contained in the Superseding Indictment made by or in the custody of any law enforcement officer whose agency at the time was formally participating in the investigation including, but not limited to, the Department of Justice or the U.S. Attorney's Office at least seven (7) days prior to the commencement of the trial so that the defense can adequately prepare its cross examination of the government's witnesses.

REQUEST FOR ORAL ARGUMENT

Defendant believes that oral argument will assist the Court and requests a hearing on this motion pursuant to Local Rule 7.1 (D).

Respectfully submitted,  
For the Defendant,  
Randall Crater  
By his attorneys:

/s/ Scott P. Lopez  
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Dated: June 9, 2022

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

The undersigned counsel for Randall Crater hereby certifies that he attempted to confer with AUSA Christopher J. Markham on June 9, 2022, by telephone, in a good faith attempt to resolve or narrow the issue raised in this motion.

/s/ Scott P. Lopez  
Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 9, 2022.

/s/ Scott P. Lopez  
Scott P. Lopez